

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MINNESOTA

Cause No: 24-cv-100 SRN/DTS

PRESTON BYRON KNAPP;
MICHELLE NICHOLE KNAPP.

Plaintiffs,

vs.

COMPASS MINNESOTA, LLC;
DANIEL PHILIP HOLLERMAN (*official and
individual capacities*).

Defendants.

Honorable Judge Susan Richard Nelson
Magistrate Judge David T. Shultz

NOTICE OF DEFAULT and MOTION FOR
DEFAULT JUDGMENT

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PLEASE TAKE NOTICE that the Plaintiffs, PRESTON BYRON KNAPP and MICHELLE NICHOLE KNAPP, by and through, Preston Byron Knapp, and Michelle Nichole Knapp, hereby move this Honorable Court for the entry of Default and move for Default Judgment against Defendant COMPASS MINNESOTA, LLC, pursuant to Federal Rule of Civil Procedure 55(a) and 55(b).

1. Defendant COMPASS MINNESOTA, LLC, was duly served with Summons and Complaint on January 25, 2024, as evidenced by the *Notice of Service of Process* and *Affidavit of Service* filed with this Court on February 2nd, 2024 (*Id.* at dkt. 9).
2. As of this filing there has been no Counsel file in to represent COMPASS MINNESOTA, LLC.

3. More than 21 days have elapsed since the service of *Summons* and *Complaint* upon Defendant COMPASS MINNESOTA, LLC, and Defendant has failed to plead or otherwise defend as provided by the Federal Rules of Civil Procedure.
4. Therefore, Defendant COMPASS MINNESOTA, LLC, is in default and has forfeited the right to contest liability.

Accordingly, Plaintiffs request that this Court grant the *Motion for Default Judgment* in the amount of **Twenty-Million Dollars (\$20,000,000.00)**, as detailed in the attached *Affidavit of Facts*.

Dated: February 20th, 2024

RESPECTFULLY SUBMITTED,

BY: /s/ Preston Byron Knapp
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/s/ Michelle Nichole Knapp
Michelle Nichole Knapp
Plaintiff, Pro Se
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Certificate of Service

Plaintiffs certify that on February 20th, 2024, the foregoing *Notice of Service of Process* was filed with the Clerk of this Court via ECF. We further certify that, on the same date, the same document was served on Counsel listed below via electronic email.

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